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DEPT. OF TRANSPORTATION

AIR TRANSPORT ASSOCIATION

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March 20, 2002

Dockets Management System,
Department of Transportation Dockets,
Room Plaza 401,
400 Seventh Street SW,
Washington, DC 20590-0001
Attention: Docket No. FAA-2001-11032

- 38

Subject: 14 CFR Parts 25 and 121: Security Considerations in the Design of the
Flightdeck on Transport Category Airplanes - Final Rule

Ladies/Gentlemen:

FAA has issued and requested comments on a Final Rule that amends 14 CFR Parts 25 and 121 regarding Security Considerations in the Design of the Flightdeck on Transport Category Airplanes. This amendment requires a means to protect the flightdeck from unauthorized intrusion and small arms fire or fragmentation devices. **This submittal provides ATA carrier comments in addition to those previously submitted on March 18, 2002.** ATA appreciates the opportunity to comment on this critical rulemaking.

Our members generally support the requirements of the rulemaking. However, as indicated in the attached comments, the cost analysis contained in the rule significantly underestimates the actual cost of the replacement doors. Timing is also a significant issue both from the lapsed time required to accomplish the modifications as well as the time remaining to accomplish the retrofit within the final deadline. From an industry perspective, we support these observations and recommend that the rule be modified as necessary to take these issues into account.

Your serious consideration of these comments would be greatly appreciated.

Sincerely,

Charlie Bautz
Director, Operational Engineering

Attachments (2)

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AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707
202.626.4000 www.airlines.org

March 20, 2002

Charlie Bautz
Director of Operational Engineering
Air Transport Association (ATA) of America
1301 Pennsylvania Avenue, NW
Suite 1100
Washington, DC 20004-1707

Subject: Comments to Docket No. FAA-2001-11032; Amendment No. 25-106 and 121-288

References:

- (A) Docket No. FAA-2001-11032; Amendment No. 25-106 and 121-288
- (B) Docket No. FAA-2001-10770; SFAR 92-3
- (C) Airbus Service Bulletin A320-25-1287, Status - development

Dear Mr. Bautz:

America West Airlines Engineering has reviewed the reference (A) final rule and supports the intent of the subject adopted Final Rule.

The impact on America West Airlines and other operators will be much greater than indicated in the reference (A) final rule. See the table for estimated America West Airlines costs.

Fleet	Aircraft Qty	Estimated Material costs, \$	Estimated Labor Costs per aircraft	Aircraft Out of Service Costs, \$	Total Costs, \$
A319/A320	80	23,000/aircraft	14000	2,176,680	5,136,680
B737	49	27,500/aircraft	4800	440,000	2,022,700
B757	13	27,500/aircraft	4800	0	419,900
Total	142			2,616,680	\$7,579,280 \$53,375/aircraft

America West Airlines will require a dedicated check line with a duration of 9 months to complete the fleet retrofit by the April 09, 2003 deadline. As shown in the table, the cost impact to America West Airlines is approximately \$2,616,680 of lost opportunity costs assuming that the installation will begin no later than June 1, 2002. America West

believes that a start date of June 1 is very optimistic without the existence of an STC and limited vendor production capabilities.

America West Airlines believes that the SFAR 92 Phase I modification provides a high level of security for the interim. To date, no solutions for the new security standards have been approved, including the reference (C) OEM solution. Therefore, based on the uncertain final design and the serious material availability and certification issues, America West Airlines is concerned that the deadline imposed by the reference (A) rule will not be achievable.

Regards,

Gary F. Martin
Senior Director
Engineering and Maintenance Support

c: Mike Mueller
Terry Radtke
Jeremy Thomas

/jst

March 19,2002

Mr. Charlie Bautz
Director – Operational Engineering
Air Transport Association of America
1301 Pennsylvania Ave. *NW* – Suite 1100
Washington DC 20004-1707

Subject: 14CFR Parts 25 and 121: Security Considerations in the Design of the
Flightdeck on Transport Category Airplanes

References: (1) Docket No. FAA-2001-11032
(2) AC 25.795-1 Flightdeck Intrusion Resistance
(3) AC 25.795-2 Flightdeck Penetration Resistance

Dear **Mr.** Bautz:

Northwest Airlines has reviewed the Immediate Adopted Rule and offers the following comments.

Operating Requirements - Flightdeck Door Requirements page 2 122 indicates that there is possible part 121 future rulemaking that would make flight deck doors mandatory on all-cargo aircraft. NW cargo aircraft do not currently have cockpit doors or even bulkheads. If this became a mandatory requirement it would be very expensive for NWA.

Benefits and Costs page 2 125 states that the FAA has determined that the low end cost to procure and install doors is \$12,000 and the high end is \$17,000. It is a very low estimate. Further it requests that supporting documentation be provided that would show the actual cost of implementation. Finally, this section states that, without exception, every flightdeck door manufacturer claimed that their version of a secure door could be installed in an overnight. Airbus is now saying it will take 160 work-hours and four days of down time to install a secure door on their narrow body fleet.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark Millam". The signature is stylized with a large, looped initial "M" and a cursive "Millam".

Mark Millam
Chief Engineer

cc: Rich Theisen
Dec Lee